State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-1A All – Please provide the frequency of pole deliveries by pole yard or

Follow-Up location.

REPLY: Poles are ordered on an "as needed" basis for jobs requiring pole

placement and maintaining yard stock for pole emergencies.

The delivery lead time is ten business days from the initial ordering date. The above applies to all Verizon New Hampshire (Verizon NH) pole

yard locations.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-1B Electrics – Please provide spare pole inventory by length and class for

Follow-Up each pole yard.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-1C Unitil – Please explain why the number of poles set in the Capital area

Follow-Up decreased so much from 2004 to 2005.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-1D All - Please provide the space allocation charts on 35' through 45' joint

Follow-Up poles. Please also provide the source for the chart designations.

REPLY: Verizon NH considers information responsive to this request to be

proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly

executed protective agreement.

Please refer to the proprietary attachment included for the allocations between the communications space and the power space on 35' through 45' joint owned / joint used poles. The source of these designations is derived from the IOPs between Verizon NH and each of the power

companies.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director - Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-1E All – Is your company experiencing difficulty obtaining poles for

Follow-Up inventory? If so, please state the reason(s).

REPLY: Verizon NH did experience some delays to the normal lead delivery time

for poles as an aftermath of Hurricane Katrina. The period was about six

weeks. No delays are occurring at present.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-3A Grid – Please review your response to DR 3-3 and confirm or revise as

Follow-Up necessary.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-5A All – What is the average response time to hear back from the joint

Follow-Up owner when a request for service involving a new pole set is received?

Please provide median and mean response times.

REPLY: Information responsive to this request is not maintained in the ordinary

course of business, and thus is not available. However, Verizon NH's experience is that Joint Owners typically respond to requests for service

involving new pole sets within a few days.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-5B Unitil – Please provide a copy of the letter/correspondence Unitil

Follow-Up received where Verizon informed you that future pole sets in the Verizon

maintenance areas would take 12 weeks after such requests are received.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-5C VZ – (the following request is to exclude FTTP work and personnel)

Follow-Up Please supply separately the number of hours of your company's line

force (listed as 70 in DR 3-4 as of 1/1/05 in New Hampshire) performing regular work and overtime work in New Hampshire by month for the period of January 2005 through the most current month available in 2006. In your response, please break the data down by garage and whether the overtime hours were expended for routine or emergency

work.

REPLY: Please refer to Attachment I for a breakdown of the total hours worked

between regular hours and overtime hours, by garage, for the period January 2005 through March 2006. The attachment excludes work hours associated with FTTP. Verizon NH does not track nor retain overtime

hours categorized by routine work nor pole emergencies.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-5D VZ – (the following request is to exclude FTTP work and personnel)

Follow-Up Please repeat request 3-5C above for personnel performing similar work

in New Hampshire from other states.

REPLY: Personnel from other states working in NH performing Outside Plant

Technician (OPT) functions are included in Verizon NH's response to Staff 3-5C Follow-Up. These technicians have been transferred to Verizon NH's OPT workforce and are not tracked as a separate entity.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-5E VZ – (the following request is to exclude FTTP work and personnel)

Follow-Up For the personnel included in request 3-5C above, please supply the

maximum number of regular time hours available by month for the period of January 2005 through the most current month available in 2006 assuming no vacations, sick time, etc. and actual regular hours worked

assuming no vacations, sick time, etc. and actual regular hours worked.

REPLY: The total number of regular time hours available, by month, for the

period January 2005 through March 2006 were as follows: (these hours

excludes those associated with personnel working on FTTP).

Jan-05 6,936 Feb-05 7,616 Mar-05 8,597 Apr-05 7,138 May-05 7,585 Jun-05 6,878 Jul-05 6,270 Aug-05 7,190 Sep-05 8,136 Oct-05 8,263 Nov-05 7,995 Dec-05 7,752 Jan-06 6,664 Feb-06 6,409 Mar-06 8,286

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-5F VZ – Please supply the number of line force (listed as 70 in DR 3-4 as of

Follow-Up 1/1/05 in New Hampshire) at the beginning of each month for the period

of January 2005 through the most current month available in 2006. Please also supply similar information for personnel performing FTTP

work.

REPLY: Verizon NH considers information responsive to this request to be

proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly

executed protective agreement.

The line force performing routine (non-FTTP) work for the period

January 2005 through March 2006 was as follows:

Jan-05 46 Feb-05 38 Mar-05 38 Apr-05 44 May-05 36 Jun-05 46 Jul-05 46 Aug-05 47 Sep-05 57 Oct-05 58 Nov-05 57 Dec-05 57 Jan-06 49 49 Feb-06

53

Mar-06

REPLY: (Cont'd) Begin Proprietary Response

End Proprietary Response

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

Follow-Up

ITEM: Staff 3-6A All - Please supply the following information regarding time associated

with pole setting activities. Your responses should exclude emergency or call-out work and related activities that may be charged to a pole setting

iob.

The average amount of pole set time in hours currently factored into job

scheduling by garage per pole set.

REPLY: The pole set time factored into jobs, as part of the scheduling process, is

the same for all garage locations. There are no differentiations. The travel time, site set-up and time to complete the work are all part of the overall scheduling process. Verizon NH does not isolate the time it takes

to set the pole from the total work time to perform all pole setting activities within the scheduling process. However, Verizon NH is able to identify the time expended in setting the pole on a retrospective basis.

Please see Verizon NH's reply to Staff 3-6C Follow-Up.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

Follow-Up

ITEM: Staff 3-6B All - Please supply the following information regarding time associated

with pole setting activities. Your responses should exclude emergency or call-out work and related activities that may be charged to a pole setting

iob.

Average travel time in hours currently factored into job scheduling by

garage per pole set.

REPLY: Travel time is an average time that is included in the total time that is

allotted to specific Line Work Operations. The travel time component is the same variable, regardless of the work location. Verizon NH does not isolate the time it takes to travel to a pole set location from the total work time to perform all pole setting activities within the scheduling

process.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-6C All - Plea

Follow-Up

All - Please supply the following information regarding time associated with pole setting activities. Your responses should exclude emergency or call-out work and related activities that may be charged to a pole setting

job.

The average actual amount of pole set time in hours by garage per pole set for the years 2002 through 2005.

REPLY:

The actual amount of time, on average, required to set a pole for the period 2004 through YTD 2006 is provided below. The "Place Rate" reflects only work time for pole set activity and not other associated activities; such as setting anchors and guys. Information responsive to the request for information by garage is not maintained in the ordinary course of business, and thus is not available. In addition, emergency and call out work cannot be excluded from the work identified below. Information for 2002 and 2003 is not available.

NH	Hours		
	(total for 2		Place
	person crew)	Poles	Rate
2006 YTD	4,563	743	3.07
2005	16,036	2,726	2.94
2004	17,163	3,609	2.38

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-6E Grid – Please review your responses to DR 1-34 and DR 1-35 and revise

Follow-Up as necessary.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-7A All – please specify the average time it takes for your company to set a

Follow-Up solely-owned pole from the day your customer requests a new pole set.

REPLY: Verizon NH does not track pole set work separately for jointly-owned

and solely-owned poles.

The average time it takes for Verizon NH to complete a customer requested pole set is 39 days. The measurement start date is dependent upon the number of poles being requested. If a customer is requesting two (2) or more poles, the clock starts when Verizon NH receives payment for the requested pole work. For a single pole set, the clock

starts at the customer initial request date.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-7B All – Please specify the average time it takes for your company to set a

Follow-Up jointly-owned pole from the day your customer requests a new pole set.

REPLY: Verizon NH does not track pole set work separately for jointly-owned

and solely-owned poles.

Please see Verizon NH's reply to Staff 3-7A Follow-Up.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-7C All – Please specify the average time it takes for your joint pole owner to

Follow-Up set a jointly-owned pole from the day your customer requests a new pole

set.

REPLY: Information responsive to this request is not maintained in the ordinary

course of business and thus is not available.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-8A All – What is the prioritization policy for pole sets by garage or work

Follow-Up area? If written, please provide that policy. How does management

ensure the policy is enforced?

REPLY: The prioritization policy for all pole sets is based upon the service order

date requested by the customer. Verizon NH's objective is for pole sets to be completed within the 30-day scheduling period. It is expected that the process outlined in Verizon NH's reply to Staff 1-36 be adhered to. That process includes mid month follow-up scheduling discussions to address compliance and scheduling issues. Please see Verizon NH's

reply to Staff 1-36.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-9B VZ - Please separately state the specific reasons why Verizon did not

Follow-Up meet its 400 net pole removal requirements in 2003 and 2005 as stated in DR 3-20. If increased workload by NHDOT or municipal projects are

part of your response, please explain why the equally heavy pole set years of 2002 and 2004 were not similarly impacted for pole removal and why the reduced pole setting year of 2005 did not see improvement. If reduced supply of removal ready poles is part of your response, please reconcile that statement with DR 3-23 which states that 3356 dual poles (of 5479) have been pending transfer for more than one year and should therefore be ready for removal and the fact that the number of dual poles

increased in 2005.

REPLY: In its response to Staff 3-20, Verizon NH explained the various factors

that might affect its ability to remove more poles than were set in a particular calendar year. To provide more specificity as requested for 2003 and 2005 would require a special study. Verizon NH also notes that in its response to Staff 1-15 and Staff 3-23, it stated that the number of poles with pending transfer activity does not imply that all other parties have completed their work and that these poles are only awaiting

work by Verizon NH.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-11A PSNH – Please explain how PSNH's practice of over-lashing the

Follow-Up secondary to the neutral conforms to the NESC.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-11B All – Please provide any written policy regarding your over-lashing

Follow-Up practice.

REPLY: Verizon NH considers information responsive to this request to be

proprietary and competitively sensitive. It will be provided subject to confidential treatment in accordance with RSA 378:43 and a duly

executed protective agreement.

Please see the attached proprietary practice used for placing lashed

optical and metallic aerial cables.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-11C NHDOT – Please provide any data that show delays in construction due

Follow-Up to electric company or Verizon delays, by utility and project, for 2002-

2005. Please provide the delays by number of weeks and any increase in

cost due to the delays. Please state whether NHDOT sought

reimbursement for any such cost increases due to construction delays and from whom any such reimbursements were received. If so, has that

had any impact on the process?

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Troy McDonald

Title: Joint Lines Specialist – ME, VT, NH

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-26A All – Please provide the number of danger trees removed by year from

Follow-Up 2000-2005. Of the total, please indicate how many removals involved

joint owner participation and how many were paid by the joint owner.

REPLY: Please see Verizon NH's reply to Staff 3-26B for the expenses incurred

associated with danger tree removal for the period 2000-2005. These expenses were obtained from Verizon NH's accounting records which do not contain all of the requested information; such as the number of trees

removed or joint owner participation.

State of New Hampshire

Docket No. DM 05-172

Respondent: Alan Cort

Title: Director – Regulatory

Respondent: Troy McDonald

Title: Joint Lines Specialist – ME, VT, NH

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-26B VZ - Please

Follow-Up

VZ - Please supply the trimming dollars included in rates from Docket DT 89-010 broken down into expensed normal maintenance trimming, expensed danger tree removal, and trimming or tree removal that is associated with construction which is capitalized. Also, as part of your response, please supply the actual expenditures for each category from 1990 through 2005.

REPLY:

Verizon NH conducted a thorough review of the voluminous files associated with Docket No. DT 89-010 and was unable to isolate the trimming dollars included in the cost studies developed in that docket.

Following are expenditures identified for the categories of trimming as requested above for those years for which Verizon NH has available data.

	New	Maintenance	Hazard	Storm
Year	Construction	Trimming	Trimming	Trimming
	Trimming			
2001	\$184,995	\$78,730	\$2,941	\$6,090
2002	\$79,128	\$248,523	\$13,043	\$11,019
2003	\$160,317	\$364,642	\$291	\$1,441
2004	\$220,371	\$99,244	\$0	\$165
2005	\$1,051,407	\$203,709	\$3,453	\$42,238

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-26C Electrics Only - For the years 2000 through 2005, please supply:

Follow-Up

- The number of danger trees identified
- The number of danger trees that Verizon agreed to participate in removing
- The number of danger trees that Verizon declined to participate in removing
- The number of danger trees still awaiting a reply from Verizon
- The number of danger trees removed, broken out between electric company and Verizon
- Total cost of removal of danger trees
- The dollar amount reimbursed by Verizon according to your individual agreements.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27A Electrics – Please provide reliability stats by voltage level 2000-2005.

Follow-Up

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Marianne Ryan

Title: Director-Construction

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27B VZ – For each question asked in set 3 where Verizon stated that the

Follow-Up information requested is not kept in the ordinary course of business,

please explain why that information is not kept in the ordinary course of

business (e.g., the data are aggregated and cannot be disaggregated).

REPLY: Verizon NH organizes its systems in a manner that it considers best

suited to managing its business. Data retention policies comply with all regulatory requirements and legal and business practices. The portions of the requests for information to which Verizon NH was unable to respond sought information that is not essential to the running of Verizon

NH's operations and is not, therefore, readily available from our systems. In addition, many of the requests would have required

extensive special studies in order to provide portions of the information requested. Staff 3-26B Follow-Up is illustrative. Verizon NH would normally not provide data in response to this request because it would require a burdensome special study. Verizon NH is responding to this request, however, in accord with its agreement to provide a response to Staff 2-28, for which Staff 3-26B Follow-Up is a similar request. As Verizon NH predicted, responding to this request has proved to be excessively burdensome, requiring more than 80 hours of time to gather

and provide the requested data.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27C All – If an electric company is constructing a new line addition in a

Follow-Up Verizon set area, who would be responsible for the trimming and to

whose specs? Are applicable specs laid out in the IOP?

REPLY: Verizon NH sets all jointly owned poles in a Verizon NH maintenance

area. In this case Verizon NH will do the trimming based upon the specifications laid out in the applicable IOP. If the power company were placing a solely owned pole line in a Verizon NH maintenance area, the power company would then be responsible for all trimming and it would

be done to their specifications.

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27D VZ – When Verizon plans 4X4 trimming for new cable placement, when

Follow-Up does it ask the joint owner whether that joint owner wants to participate

in trimming? If Verizon doesn't ask, why not?

REPLY: Normally, Verizon NH does not request that a joint owner participate in

trimming for new cable placement. When Verizon NH chooses 4X4 trimming, it is always done at Verizon NH's expense. In Verizon NH's experience, 4X4 trimming is usually the most efficient and economical

form of trimming associated with new cable placement.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27E Electrics Only - Please explain in detail how your company determines

Follow-Up when a total circuit requires maintenance trimming by distribution

voltage class level. If reliability performance is part of your response, please specifically and separately state how both frequency and duration

is factored into your decision for permanent faults and how the frequency of momentary outages is factored into your decision.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27F Electrics Only - Please explain in detail how your company determines

Follow-Up when a total circuit or portion of a circuit requires hot spot trimming by

distribution voltage class level. If reliability performance is part of your response, please specifically and separately state how both frequency and duration is factored into your decision for permanent faults and how

frequency of momentary outages is factored into your decision.

REPLY: Verizon response not required.

State of New Hampshire

Docket No. DM 05-172

Respondent: Title:

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up

DATED: May 4, 2006

ITEM: Staff 3-27G Electrics Only - As part of your quarterly reliability submittals to the

Follow-Up NHPUC, each company tracks a proxy for momentary outages. Please

explain how this information is used in your maintenance trimming and hot spot trimming decisions. If this information is not used, please

explain why not.

REPLY: Verizon response not required.